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April 9, 2018

Via Electronic Mail and First Class Mail

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter are three (3) copies of The Narragansett Electric Company d/b/a National Grid's First Set of Data Requests to the Division of Public Utilities and Carriers. Please note that data requests 1-44, 1-45 and 1-46 are identical to data requests 1-1, 1-2, and 1-3 from The Narragansett Electric Company d/b/a National Grid's First Set of Data Requests to the Division of Public Utilities and Carriers in Docket 4780.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Ramos", written over a horizontal line.

Adam M. Ramos

AMR:cw
Enclosures

cc: Docket No. 4770 Service List (electronically only)

57613479 (57972.174791)

Docket No. 4770 - National Grid – Rate Application
Service list updated 3/20/2018

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY) d/b/a NATIONAL GRID – ELECTRIC AND GAS) DISTRIBUTION RATE FILING)	Docket No. 4770 ISSUED APRIL 9, 2018
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**THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID'S
FIRST SET OF DATA REQUESTS TO
THE DIVISION OF PUBLIC UTILITIES AND CARRIERS**

TESTIMONY OF WITNESS JOHN ATHAS

A. Allocated Cost of Service

- 1-1. Provide Schedule JGA-3 to the testimony of Witness John Athas in working Excel format with formulae intact.
- 1-2. Provide the workpapers and other documents that support Schedule JGA-3 to the testimony of Witness John Athas. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-3. Provide Table 1 contained within the testimony of Witness John Athas, in native format and, as applicable, in Excel format with formulae intact.
- 1-4. Provide all workpapers and other documents that support Table 1 contained within the testimony of Witness John Athas, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-5. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness John Athas, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

B. Rate Design

- 1-6. Provide Schedule JGA-4, and Schedule JGA-5 to the testimony of Witness John Athas in working Excel format with formulae intact.
- 1-7. Provide the workpapers and other documents that support Schedule JGA-4, and Schedule JGA-5 to the testimony of Witness John Athas. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

- 1-8. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness John Athas, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESSES TINA BENNETT AND ALLEN NEALE

A. Gas Business Enablement

- 1-9. Provide Exhibit GBE-3 to the testimony of Witnesses Tina Bennett and Allen Neale in working Excel format with formulae intact.
- 1-10. Provide the workpapers and other documents that support Exhibit GBE-3 to the testimony of Witnesses Tina Bennett and Allen Neale. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-11. Provide the table that appears at the top of page 26 of the testimony of Witnesses Tina Bennett and Allen Neale in native format and, as applicable, in Excel format with formulae intact.
- 1-12. Provide all workpapers and other documents that support the table that appears at the top of page 26 of the testimony of Witnesses Tina Bennett and Allen Neale, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-13. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Tina Bennett and Allen Neale, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESS ROGER D. COLTON

A. Low Income Customers

- 1-14. Provide Schedules RDC-1, RDC-2, RDC-3, RDC-4, RDC-5, and RDC-6 to the testimony of Witness Roger D. Colton in working Excel format with formulae intact.
- 1-15. Provide the workpapers and other documents that support RDC-1, RDC-2, RDC-3, RDC-4, RDC-5, and RDC-6 to the testimony of Witness Roger D. Colton. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-16. Provide Chart 1, Chart 2, Chart 3, Chart 4, Chart 5, Chart 6, Chart 7, Chart 8, Chart 9, Chart 10, Chart 11, Chart 12, Table 1, Table 2, Table 3, Table 4, Table 5, Table 6, Table 7, Table 8, Table 9, Table 10, Table 11, Table 12, and Table 13 from the testimony of Witness Roger D. Colton in native format and, as applicable, in Excel format with formulae intact.

- 1-17. Provide all workpapers and other documents that support Chart 1, Chart 2, Chart 3, Chart 4, Chart 5, Chart 6, Chart 7, Chart 8, Chart 9, Chart 10, Chart 11, Chart 12, Table 1, Table 2, Table 3, Table 4, Table 5, Table 6, Table 7, Table 8, Table 9, Table 10, Table 11, Table 12, and Table 13 from the testimony of Witness Roger D. Colton, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-18. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Roger D. Colton, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESS ROXIE MCCULLAR

A. Depreciation

- 1-19. Provide Schedules RMM-1 and RMM-2 to the testimony of Witness Roxie McCullar in working Excel format with formulae intact.
- 1-20. Provide the workpapers and other documents that support Schedules RMM-1 and RMM-2 to the testimony of Witness Roxie McCullar. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-21. Provide Schedules RMM-5, RMM-8 and RMM-10 to the testimony of Witness Roxie McCullar in working Excel format with formulae intact.
- 1-22. Provide the workpapers and other documents that support Schedules RMM-5, RMM-8 and RMM-10 to the testimony of Witness Roxie McCullar. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-23. Provide Table 1, Table 2, Table 3, Table 4, Table 5, and Table 6 from the testimony of Witness Roxie McCullar in native format and, as applicable, in Excel format with formulae intact.
- 1-24. Provide all workpapers and other documents that support Table 1, Table 2, Table 3, Table 4, Table 5, and Table 6 from the testimony of Witness Roxie McCullar, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-25. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Roxie McCullar, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESSES MICHAEL R. BALLABAN AND DAVID J. EFFRON

A. Revenue Requirement

- 1-26. Provide Schedule RRP-E-1, RRP-E-2, RRP-E-3, RRP-E-4, RRP-E-5, RRP-E-6, RRP-E-7, RRP-E-8, RRP-E-9, RRP-G-1, RRP-G-2, RRP-G-3, RRP-G-4, RRP-G-4.1, RRP-G-5, RRP-G-6, RRP-G-7, RRP-G-8, RRP-G-8.1, and RRP-G-9 to the testimony of Witnesses Michael R. Ballaban and David J. Effron in working Excel format with formulae intact.
- 1-27. Provide the workpapers and other documents that support RRP-E-1, RRP-E-2, RRP-E-3, RRP-E-4, RRP-E-5, RRP-E-6, RRP-E-7, RRP-E-8, RRP-E-9, RRP-G-1, RRP-G-2, RRP-G-3, RRP-G-4, RRP-G-4.1, RRP-G-5, RRP-G-6, RRP-G-7, RRP-G-8, RRP-G-8.1, and RRP-G-9 to the testimony of Witnesses Michael R. Ballaban and David J. Effron. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-28. Provide Figure 1, Figure 2, Figure 3, Figure 4, Table 4, Table 6, Table 7 (on page 49), Table 7 (on page 50), and Table 8 from the testimony of Witnesses Michael R. Ballaban and David J. Effron in native format and, as applicable, in Excel format with formulae intact.
- 1-29. Provide all workpapers and other documents that support Figure 1, Figure 2, Figure 3, Figure 4, Table 4, Table 6, Table 7 (on page 49), Table 7 (on page 50), and Table 8 from the testimony of Witnesses Michael R. Ballaban and David J. Effron, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-30. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Michael R. Ballaban and David J. Effron, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESS MATTHEW I. KAHAL

A. Return on Equity

- 1-31. Provide Schedule MIK-1, MIK-2, MIK-3, MIK-4 and MIK-5 to the testimony of Witness Matthew I. Kahal in working Excel format with formulae intact.
- 1-32. Provide the workpapers and other documents that support Schedule MIK-1, MIK-2, MIK-3, MIK-4 and MIK-5 to the testimony of Witness Matthew I. Kahal. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-33. Provide Table 2 from the testimony of Witness Matthew I. Kahal in native format and, as applicable, in Excel format with formulae intact.

- 1-34. Provide all workpapers and other documents that support Table 2 from the testimony of Witness Matthew I. Kahal, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-35. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Matthew I. Kahal, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESS BRUCE R. OLIVER

A. Cost of Service

- 1-36. Provide Schedule BRO-1 and BRO-2 to the testimony of Witness Bruce R. Oliver in working Excel format with formulae intact.
- 1-37. Provide the workpapers and other documents that support Schedule BRO-1 and BRO-2 to the testimony of Witness Bruce R. Oliver. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-38. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Bruce R. Oliver, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

B. Rate Design

- 1-39. Provide Schedule BRO-3, BRO-4, BRO-5, BRO-6, and BRO-7 to the testimony of Witness Bruce R. Oliver in working Excel format with formulae intact.
- 1-40. Provide the workpapers and other documents that support Schedule BRO-3, BRO-4, BRO-5, BRO-6, and BRO-7 to the testimony of Witness Bruce R. Oliver. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.
- 1-41. Provide Table 1 from the testimony of Witness Bruce R. Oliver in native format and, as applicable, in Excel format with formulae intact.
- 1-42. Provide all workpapers and other documents that support Table 1 from the testimony of Witness Bruce R. Oliver, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-43. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Bruce R. Oliver, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

TESTIMONY OF WITNESSES TIM WOOLF AND MELISSA WHITED

A. Performance Incentive Mechanisms

- 1-44. Provide: (a) Table 5, Figure 2, Figure 3, from the testimony of Witnesses Tim Woolf and Melissa Whited, and (b) Table 1, Table 2, Table 3, and Table 4 from Exhibit TW/MW-3 to the testimony of Witnesses Tim Woolf and Melissa Whited, in native format and, as applicable, in Excel format with formulae intact.
- 1-45. Provide all workpapers and other documents that support (a) Table 5, Figure 2, Figure 3, from the testimony of Witnesses Tim Woolf and Melissa Whited, and (b) Table 1, Table 2, Table 3, and Table 4 from Exhibit TW/MW-3 to the testimony of Witnesses Tim Woolf and Melissa Whited, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.
- 1-46. Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Tim Woolf and Melissa Whited, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.